

Bob Segalman, Ph.D.  
3330 Tropicana Court  
Sacramento, CA 95826

October 30, 2006

BY ELECTRONIC FILING

Ms. Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 Twelfth Street, S.W.  
Washington, DC 20554

Re: CG Docket No. 03-123

Dear Ms. Dortch:

In considering changes to its rate methodology for TRS, the FCC must ensure that whatever approach it chooses to adopt give providers sufficient funding to continue offering STS and other relay services and to expand their outreach and education efforts.

Hundreds of thousands of Americans are denied the benefits of critically important relay services such as STS, VRS, IP Relay and TTY simply because they are unaware that these services are available to them. Outreach and education are essential to fixing this problem and meeting the ADA's universal service requirements. Under the ADA, the FCC is ultimately responsible for ensuring adequate outreach as part of its general duty to ensure the availability of relay services to speech-disabled and deaf individuals in the United States. The FCC must adopt a methodology and a funding level that gives TRS providers the incentive and the funding to increase outreach efforts.

Educational outreach programs are the cornerstone of ensuring TRS availability. Relay services are of no use to people who don't know they exist. Outreach efforts are designed to inform people with speech disabilities and deaf persons of the communications options that are available to them and to teach them how to use these services. Outreach efforts also educate non-speech-disabled and hearing people so that they become more familiar with receiving and making relay service calls.

Educational outreach programs offer a proven and effective means of reaching the statutory goals for STS, VRS, and other forms of TRS.

Outreach works. As I've explained before, educational outreach has been critically important to the development of STS, both with regard to reaching people with speech disabilities and in educating others about this important service. My personal experience has shown that education and live demonstrations can be very effective in expanding the use of STS. This will become even more important as the technological innovation promoted by the ADA leads to new or improved relay service options, such as STS video relay.

Many forms of TRS are grossly under-utilized. For example, STS currently reaches less than 5 percent of potential STS users. This is not due to a lack of need for or interest in the services, however. Rather, the low number of users is a result of a lack of knowledge about STS and other forms of TRS. The FCC should remedy the wide-scale lack of knowledge about relay services by increasing incentives and funding for providers to offer educational outreach programs.

The FCC is considering whether only non-branded educational outreach efforts should be compensated by the TRS Fund. This approach would unnecessarily limit the potential for outreach programs. The importance of outreach is the message, not the mechanism. A debate over whether educational outreach programs can be provider-branded misses the point: educational outreach programs, both branded and non-branded, accomplish the same important education objectives and should be supported equally. The FCC should not do anything to discourage providers from engaging in outreach.

In addition, the FCC asks whether the ADA allows funding of individual provider outreach campaigns. Not only does the statute allow individual outreach campaigns, it requires them. Moreover, I find it alarming that the FCC, which previously has declined to fund a coordinated national outreach campaign, is now also considering making individual outreach efforts ineligible for funding. This position does not reflect a commitment to widespread availability of STS and other relay services. Even if different providers reach out to the same audiences (such as a library, senior center, or rehabilitation center), they are likely to reach different individuals each time. Efforts to avoid duplication are likely to restrict the messages that reach the speech-disabled and deaf communities. The FCC should avoid an approach that limits messages about STS, VRS or other relay services.

The FCC's lackluster approach toward TRS outreach efforts stands in contrast to its commitment toward effective outreach programs for other groups, such as low income telephone subscribers. The FCC promotes outreach for universal service programs for the hearing and non-speech-disabled, yet it tries to limit outreach efforts for deaf and speech-disabled Americans. Yes, outreach programs cost money and the FCC has expressed concern about the potential for growth in the size of the Fund's

obligations. But, if the FCC rejects educational outreach programs as being “too expensive,” it will effectively be saying that the benefits to the lives of speech-disabled and deaf Americans just aren’t worth it. This is unfair, unacceptable, and not what Congress had in mind when it gave the FCC responsibility for ensuring the availability of telecommunications relay services to the greatest extent possible.

I strongly encourage the FCC to adopt a funding methodology that encourages providers to increase educational outreach programs and raise awareness of STS, VRS and other forms of TRS not only for speech-disabled and deaf individuals, but also for all Americans. Anything less would not only be contrary to the ADA, it would also be a slap in the face to speech-disabled and deaf Americans.

Very truly yours,

/s/

Bob Segalman, Ph.D.  
Founder, Speech to Speech